

Customer No.: 31561  
Docket No.: 11835-US-PA  
Application No.: 10/711,541

### **REMARKS**

#### **Present Status of the Application**

Upon entry of the amendments in this response, claims 1-14 are pending of which the claims 1 and 9 have been amended to eliminate informalities thereof without prejudice or disclaimer in order to more explicitly describe the claimed invention. It is believed that no new matter is added by way of amendments made to claims 1 and 9. In addition, minor errors were found in the "ABSTRACT" and accordingly amended. For at least the foregoing reason, applicants respectfully submit that claims 1-14 patently define over prior art of record and reconsideration of this application is respectfully requested.

#### **Discussion for amendments made to claims 1 and 9**

During reviewing the claims in the specification, applicants found claims 1 and 9 have some informality. For example, the word "and" in the claim 1 is misplaced and thus should be amended. Therefore, the claims 1 and 9 have been amended to eliminate informalities thereof without introducing any new matter.

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**Discussion for objection to claims under 35 U.S.C.102 (e)**

*4. Claims 1-14 are rejected under 35 U.S.C.102 ( e) as being anticipated by*

*Cedar et al.(U.S. patent no. 6,820,148)*

*Re claims 1, 9 and 14, Cedar discloses multiple removable non-volatile memory cards serially communicating with a host, determining whether a present reading address of the reading command is same as a previous reading address, ( col. 5, lines 57+; col. 7, lines 53-67; col. 8, lines 1+; the previous description is referred to "the first element" hereinafter), wherein when said present reading address is same as said previous reading address; outputting a response and outputting a data in a data-lag mode to output said data after said response is outputted, (col. 8, lines 11+; the previous description is referred to "the second element" hereinafter), wherein when said present reading address is not same as said previous reading address; and updating said previous reading address to be said present reading address, output said response and outputting said data in a data-parallel mode to output said data regardless of whether or not said response is outputted (col. 10, lines 1-67; the previous description is referred to "the third element" hereinafter).*

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In response thereto, applicants respectfully traverse the preceding objections based on the following arguments and thus withdrawal of objections to the claims 1, 9 and 14 is respectfully requested. To establish a prime case of anticipation, US patent no. 6,820,148 (Cedar, hereinafter referred to Cedar) should teach every element disclosed in the independent claims 1, 9 and 14 in the present invention. Actually, the claims 1, 9 and 14 are featured in their incorporating three elements that are referred to "the first element," "the second element" and "the third element," as disclosed in preceding paragraph. Prior to proceeding with comparison between Cedar and the three elements, applicants would like to make a brief comparison between Cedar and the present invention. The present invention employs a memory card controller implemented in a memory card to determine whether a card reader is compatible with the memory card so as to promote reading efficiency. In other words, the present invention is actually executed inside the memory card; that is, when receives a reading command output from a host (or called "card reader"), the memory card determines whether a reading address to be accessed by the reading command is the same as a previous reading address, and then selects modes for transferring data stored in the memory card to the host (i.e. a data-lag mode or a data-parallel mode) in accordance with a determined result by the memory card controller. In contrast, Cedar

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does not need a determination of whether memory cards are compatible with a card reader because Cedar doesn't implement the card reader at all but a host in which there is no compatibility problem between memory cards and the host. Besides, the invention by Cedar is implemented inside a card reader (i.e. host 51) that allows related card addressed to be assigned to a variety of memory cards when they are plugged into sockets. Moreover, in terms of a MultiMediaCard flowchart, the present invention is utilized, followed by a card-identification process as disclosed by Cedar, for determining which data transfer mode (i.e. a data-lag mode or a data-parallel mode) to be used. As a result, in terms of problems to be solved (i.e. invention motives) and ways for executing their inventions, Cedar and the present invention are distinct.

Furthermore, regarding the examiner's allegation that "the first element" is discloses in col. 7, lines 53-67, in Cedar, applicants found the examiner misinterpreted this disclosure as "the first element." In fact, this disclosure has nothing to with "the first element" but discloses that a host is able to assign a different number of addresses to each of memory cards. In addition, regarding the examiner's allegation that "the second element" is disclosed in col. 8, lines 11+, in Cedar, in fact, this disclosure dose not disclose any description associated with "output data in a data-lag mode" as featured in "the second element," but discloses how the memory cards are in turn addressed and then communicable with a host. Likewise, the examiner did err

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in interpreting a disclosure in col. 10, lines 1-67, in Cedar, in order that this misinterpretation discloses "the third element." Especially, the examiner did err in interpreting the lines 8 and 32 in col. 10, in Cedar, in which there disclose "transferred in parallel" and "loaded in parallel," because what is transferred and loaded in parallel in Cedar, is only data, rather than "response" and data in the present invention. Therefore, Cedar fails to reach, suggest or disclose "the first element," "the second element" and "the third element," as claimed in the amended claims 1 and 9, as well as the claim 14. That is, these claims are not anticipated by Cedar and thus can be placed in an allowance condition.

In re claim 2, there is no finding of "output data in data-lag mode," as claimed in the claim 2, in col. 9, lines 45+ in Cedar, as specified by the examiner. As a result, the examiner's objection to the claim 2 has no ground and thus the claim 2 is not anticipated by Cedar and thus can be placed in an allowance condition.

In re the claims 3-4, as the same situation as the preceding paragraph, there is no finding of "output data in data-lag mode," as claimed in the claim 2, in col. 8, lines 30+ and col. 10, lines 54+ , in Cedar, as specified by the examiner. As a result, the examiner's objection to the claims 3-4 has no ground and thus the claims 3-4 are not anticipated by Cedar and thus can be placed in an allowance condition.

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In re the claims 5 and 10, the examiner alleged that the disclosure in col. 10, lines 10+, in Cedar discloses "the reading command passes a cyclic redundancy check (CRC)," as claimed the claims 5 and 10. However, in fact, this disclosure only discloses data passes CRC, rather than the reading command's passing CRC in the present invention. As a result, the examiner's objection to the claims 5 and 10 has no ground and thus the claims 5 and 10 are not anticipated by Cedar and thus can be placed in an allowance condition.

In re the claims 6 and 11, the examiner alleged that the disclosure in col. 9, lines 52+, in Cedar, discloses the feature as claimed in the claims 6 and 11. However, this disclosure only discloses the procedures for reading data from one of memory cards inserted into a plurality of sockets that are integrated with a host, but fails to disclose "data being read during a period of outputting said response," as claimed the claims 6 and 11. Therefore, the claims 6 and 11 are not anticipated by Cedar and thus can be placed in an allowance condition.

In re the claims 7 and 12, the examiner alleged that the disclosure in col. 11, lines 28-42, in Cedar, discloses that the flowchart shown in Fig. 11 is to make sure all memory cards are completely read, as claimed in the claims 7 and 12. However, the subject matters of claims 7 and 12 are to make sure all blocks of data are completely output in response to the multi-block command. Evidently, the examiner

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misinterprets the subject matters of claims 7 and 12 and thus his (her) objection to these two claims has no ground. As a result, the claims 7 and 12 are not anticipated by Cedar and thus can be placed in an allowance condition.

With respect to claims 8 and 13, no matter whether a SD memory is a conventional device, the dependent claims 8 and 13 should be patentable as a matter of law for at least the reason that they contain all limitations of their corresponding base claims 1 and 9, respectively. That is, the claims 8 and 13 are not anticipated by Cedar and thus can be placed in an allowance condition.

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### CONCLUSION

For at least the foregoing reasons, it is believed that all the pending claims 1-14 of the present application patentably define over the prior art and are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned.

Respectfully submitted,

Date :

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